

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**UNITED STATES OF AMERICA,**

*Plaintiff,*

**v.**

**BARRY WARE,**

*Defendant.*

**No. 08 CR 00122**

**Judge Harry D. Leinenweber**

**DEFENDANT, BARRY WARE’S MOTION TO REQUIRE GOVERNMENT TO  
GIVE IMMEDIATE NOTICE OF ITS INTENTION TO USE EVIDENCE OF  
OTHER CRIMES**

NOW COMES the defendant, BARRY WARE (hereinafter, “defendant”), by and through his attorney, STANLEY L. HILL, and respectfully moves this Honorable Court for an order requiring the government to give immediate notice of its intention to use evidence of other crimes, wrongs, and/or bad acts, pursuant to Rule 404(B).

Respectfully submitted,

/s/ Stanley L. Hill

Stanley L. Hill  
STANLEY L. HILL & ASSOCIATES, P.C.  
651 West Washington Boulevard, Suite 205  
Chicago, Illinois 60661  
T. 312.917.8888  
F. 312.781.9401  
E. [stanhill@core.com](mailto:stanhill@core.com)  
W. [www.stanhilllaw.com](http://www.stanhilllaw.com)